

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
BANKRUPTCY DIVISION

In Re: ) Chapter 7  
WILLIAM R. MEARA ) Case No. 14-12998-WCH  
BRENDA J. MEARA )  
Debtors )-----

OBJECTION OF DEBTORS TO NOTICE OF INTENDED PRIVATE SALE  
OF ESTATE PROPERTY AND NOTICE OF INTENDED  
ASSIGNMENT OF CONTRACTS – DOCUMENT 64

To the Honorable William C. Hillman, Bankruptcy Judge:

The above captioned Debtors, by and through their undersigned Counsel, submit the following opposition to the Notice of Intended Private Sale of Estate Property and Notice of Intended Assignment of Contracts – Document 64 (hereinafter collectively the “Documents”). Pursuant to an Order of this Court, Objections are due on June 11, 2015, and a hearing is scheduled on June 17, 2015 at 9:30 A.M.

The Debtors assert that they have standing to submit this Opposition because if the objection is accurate there will be funds available over and above the funds for payment in full of all creditors and expenses of administration.

1. The Debtors do not believe that complete and accurate financial records have been delivered to the Trustee by Vector/Meara Transit Advertising Group LLC (hereinafter “Vector”). The Debtors believe an audit of the records of Vector is the only method by which a correct and accurate valuation of the assets can be determined.
2. For many years prior to the filing of this case, Mr. Meara had been attempting to obtain financial information from Vector which was not provided. Mr. Meara was a

partner in Vector and formulated a business plan in 2005 when Vector was billing \$18 Million Dollars and today Vector has sales in excess of \$100 Million Dollars. Vector had not shared profits over the past eighteen (18) months which should increase the value of Mr. Meara's claim.

3. In 2006 to 2013, the amount of \$45 Million was billed solely on the Las Vegas contract and did not include Signage Production.
4. In addition, various assets, namely ten (10) year contracts in Boston & San Francisco Taxi Top Category in 2012-2013, plus Boston Coach and Sphinx Transit New York contracts add significant value to the Vector assets being sold by the Trustee.
5. Mr. Meara believes, given the value of all the contracts, the assets are worth a minimum of \$680,000.00.
6. Mr. Meara started this company and became a victim of Vector's business decisions. When the Las Vegas transit contract was awarded August 18, 2013, Vector stopped his monthly income of \$6,900.00.
7. The Trustee recently informed Counsel to the Debtor that Vector would not consent to the disclosure of the financial and corporate records (the "Documents") to Mr. Meara.
8. A review by Mr. Meara of these Documents is a key element to determine an accurate valuation and a fair and reasonable sale price for the assets.
9. Mr. Meara will appear at the hearing on June 17, 2015 to provide any testimony necessary for the Court.

WHEREFORE, the Debtor requests that this sale not be approved until such time as all documentation delivered to the Trustee by Vector be delivered to Mr. Meara so he may provide

the Trustee additional information to help determine a reasonable and accurate sale price for the assets of Vector.

William R. Meara  
Brenda J. Meara  
By their Counsel,

Dated: June 11, 2015

/s/Gary W. Cruickshank, Esq.  
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CERTIFICATE OF SERVICE

I, Gary W. Cruickshank, hereby certify that a copy of the attached Objection has been served electronically, unless otherwise noted, via regular United States mail, postage prepaid, upon the following added creditors:

United States Trustee  
John W. McCormack Post Office  
and Courthouse  
5 Post Office Square, 10<sup>th</sup> Floor  
Suite 1000  
Boston MA 02109

Warren E. Agin, Esq.  
Swiggart & Agin  
Trustee in Bankruptcy  
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Christopher Carter, Esq.  
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Internal Revenue Service  
P.O. Box 8208  
Philadelphia PA 19101

Internal Revenue Service  
SPS JFK Bldg.  
PO Box 9112  
Stop 20800  
Boston MA 02203

Dated: June 11, 2015

/s/Gary W. Cruickshank, Esq.